

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK**

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In re:

KRISHNA JAGROO

Chapter 13

Debtor.

Case No. 19-40123-nhl

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ATTORNEY AFFIRMATION IN OBJECTION TO MOTION TO RECONVERT CASE

Joseph Y. Balisok, an attorney admitted to practice in the Courts of the State of New York, and not a party to this action, subscribes and affirms the following to be true under the penalties of perjury:

1. I am the attorney for the Plaintiff in the above-referenced matter, and am fully familiar with the facts and circumstances of this action.

2. The Debtor's spouse has agreed to return her interest in her principal residence to the Debtor.

3. I called the Chapter 13 Trustee and informed her that the spouse would return her interest and thereby reverse the alleged violation which gives rise to the stated purpose of the chapter 13 Trustee's Motion to reconvert to chapter 7. The Trustee ignored my call and never even responded to this important new fact.

4. If the case is reconverted to chapter 7, the Debtor will lose his primary residence and his wife and his children will be rendered homeless.

5. If the case is reconverted to chapter 7, the Debtor will lose substantial equity in his property because an auction of her residence will glean substantially less than the current fair market value of the premises.

6. If the case is reconverted to chapter 7, the Debtor will lose considerable equity because the chapter 7 Trustee will charge substantial fees and costs.

7. The Debtor intends to pay her creditors in full through her chapter 13 plan.

8. The balance of the equities in this matter requires that the matter not be reconverted to chapter 7.

WHEREFORE, the Debtor prays that this bankruptcy case not be reconverted to chapter 7.

Dated: Brooklyn, New York
May 13, 2020

/s/ Joseph Y. Balisok
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